



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 10**  
**HANFORD/INL PROJECT OFFICE**  
825 Jadwin Ave., Suite 210  
Richland, Washington 99352

December 8, 2016

Kris McCaig  
Project Manager  
Teck American Incorporated  
501 North Riverpoint Boulevard, Suite 300  
Spokane, Washington 99202

VIA ELECTRONIC MAIL ONLY

Dear Ms. McCaig,

As you are aware, the 2014 Residential Soil Sampling program and the 2014 Upland Soil Sampling results indicated elevated levels of metals in the soil in the Upper Columbia River Site. The Tribal Consumption and Resource Use Survey identifies uses of plants harvested from areas that overlap with locations where metals are elevated. Residents of the Confederated Tribes of the Colville Reservation (CCT) consume, and otherwise utilize, upland, wetland and aquatic plants which may be contaminated with heavy metals, but plant exposure point concentrations (EPCs) are unknown. EPA has determined that data for the concentration of target analyte list (TAL) metals in plant tissue are needed for the Upper Columbia River (UCR) human health risk assessment. Data for the concentration of metals in co-located soil and sediment samples are necessary due to the potential for the inadvertent ingestion of soil while gathering plants and utilizing plant materials gathered from the UCR Site for weaving and other uses.

Section 3.2.5 of the Statement of Work for the Settlement Agreement provides for the possibility that EPA may require TAI to conduct plant sampling.

**Statement of Work for Remedial Investigations and Feasibility Studies Upper Columbia River Site, Appendix A.**

3.2.5 Terrestrial Soil and Vegetation Residue Sampling and Analysis Depending on how the upland portion of the Study Area is defined (see Section 3.1 .f), EPA may require The Company to conduct co-located sampling of bulk soil and vegetation and other pertinent parameters needed to evaluate exposures of human health and wildlife (Section 5.2.9). These data shall also be used to refine estimates of depositional footprints from atmospheric emissions from the Trail facility 2nd dust from Lake Roosevelt (Sections 3.1.3 and 3.2.6)...Vegetation sampling must represent both plants growing naturally and under cultivation. The types of vegetation to be sampled must represent those consumed by tribal members (e.g., culturally significant forbs/grasses/shrubs) and the general public (as well as wildlife as described in subsequent sections.)

Pursuant to this paragraph, EPA is now directing Teck to fund this effort. This work will require close coordination with the Confederated Tribes of the Colville Reservation. There may be sensitive information about how plants are harvested or used; therefore, EPA will be developing the QAPP and leading the sampling program. As with the Tribal Consumption and Resource Use Survey, TAI will be

given draft versions of documents for the project, including but not limited to the Data Quality Objectives, the QAPP and the Data Summary Report. Enclosed are Steps 1-5 of the Data Quality Objectives for the Sampling of Terrestrial Plants and Laboratory Analysis of Tissues for Metals. Please send any comments to me by January 13, 2017.

Sincerely,

A handwritten signature in black ink, appearing to read 'Laura C. Buelow', with a stylized, flowing script.

Laura C. Buelow  
Project Manager

cc: Kathryn Cerise, U.S. EPA  
Dan Audet, U.S. Department of Interior  
Patti Bailey, Confederated Tribes of the Colville Reservation  
Randy Connolly, Spokane Tribe of Indians  
John Roland, Washington Department of Ecology